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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

UNITED STATES OF AMERICA	:	CRIMINAL NO. 4:16-CR-20 (CDL)
v.	:	VIOLATIONS:
WILFRED E. WRIGHT a.k.a. "Will,"	:	18 U.S.C. § 2252A(a)(2)(A)
	:	18 U.S.C. § 2252A(b)(1)
Defendant	:	18 U.S.C. § 2252A(a)(5)(B)
	:	18 U.S.C. § 2252A(b)(2)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
(Receipt and Distribution of Child Pornography)

That on or between January 1, 2014, and January 1, 2016, in the Columbus Division of the Middle District of Georgia and elsewhere within the jurisdiction of this Court,

WILFRED E. WRIGHT a.k.a. "Will,"

Defendant herein, did knowingly receive and distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).

COUNT TWO
(Possession of Child Pornography)

That on or between August 1, 2014, and August 7, 2014, in the Columbus Division of the Middle District of Georgia and elsewhere within the jurisdiction of this Court,

WILFRED E. WRIGHT a.k.a. "Will,"

Defendant herein, did knowingly possess and access with intent to view, material which contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor, and which was produced using materials that had been mailed, mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

COUNT THREE
(Possession of Child Pornography)

That on or about February 25, 2015, in the Columbus Division of the Middle District of Georgia and elsewhere within the jurisdiction of this Court,

WILFRED E. WRIGHT a.k.a. "Will,"

Defendant herein, did knowingly possess and access with intent to view, material which contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor, and which was produced using materials that had been mailed, mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE NOTICE
(18 U.S.C. § 2253 - Criminal Forfeiture)

1. The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 18, United States Code, Section 2253.

2. Upon conviction of the offense(s) in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1) set forth in Count One, and/or Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2) set forth in Counts Two and Three of this Indictment, the defendant, **WILFRED E. WRIGHT,** shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 2253:

(a) Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

(b) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and

(c) Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense(s), or any property traceable to such property.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon exercise of due diligence;

(b) has been transferred, sold to or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All pursuant to 18 U.S.C. § 2253.

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

Presented by:

G.F. "PETE" PETERMAN, III
UNITED STATES ATTORNEY

C. Shanelle Booker
C. SHANELLE BOOKER
Assistant United States Attorney

Filed in open court this 13th day of July, 2016.

C Hunsford
Deputy Clerk